

March 8, 2011

Mr. Dwight Peavey, Small Business Advocate
United States EPA – New England (OES-05-1)
5 Post Office Square, Suite 100
Boston, MA 02109-3912

RE: Tremblay's Bus Co., LLC
DUNS#052629862, SIC 4151-01
284 Myrtle Street
New Bedford, MA 02746

\ Tremblay's Motor Coach, LLC
DUNS#004159559, SIC 4141
284 Myrtle Street
New Bedford, MA 02746

Dear Mr. Peavey:

I, Lucien P. Tetreault, Jr., represent Tremblay's Bus Co., LLC and Tremblay's Motor Coach, LLC in my capacity as Vice President. The two Companies are brother – sister organizations that occupy operating space at 284 Myrtle Street, New Bedford, MA. Both Companies are small business concerns and we are requesting coverage under the EPA's Small Business Policy.

The two Companies combined employ a total of 362 employees with 325 of the total comprising part time employees. Please note that these part time employees typically represent school bus drivers and monitors that work approximately 15 to 20 hours per week for 36 weeks of the year. These part time people do not work on holidays, school vacations or in the summer. Our average employee does not work in excess of 720 hours per year.

During a self audit on or about February 28, 2011, we discovered 4 violations that are as follows:

1. Tier 2 Filing – Not previously filed
2. EPCRA 302 – Not previously filed (Sulfuric Acid)
3. S.P.C.C. – Spill Control Prevention and Counter Measures Plan
4. Storm Water Pollution Prevention Plan & NOI

TREMBLAY'S
BUS CO., LLC

www.tbcbus.com
284 Myrtle St., New Bedford, MA 02746

Telephone
(508) 999-6436
1-800-937-3764

FAX
(508) 992-9912

We are working to correct these violations and we have hired a third party consultant to assist us in preparing the necessary policies and procedures required.

Tremblay's Bus Co., LLC and Tremblay's Motor Coach, LLC are requesting coverage under the EPA's Small Business Policy (also known as Policy on Compliance Incentives for Small Businesses).

If you should have any further questions and or comments with regards to this disclosure, please contact me at (508)999-6436, extension 213.

Yours truly,

A handwritten signature in black ink, appearing to read "Lucien P. Tetreault, Jr.", with a stylized flourish at the end.

Lucien P. Tetreault, Jr., VP

March 8, 2011

Mr. Dwight Peavey, Small Business Advocate
United States EPA – New England (OES-05-1)
5 Post Office Square, Suite 100
Boston, MA 02109-3912

RE: Tremblay's Bus Co., LLC
DUNS#052629862, SIC 4151-01
84 Lawrence Street
Fall River, MA 02721

Dear Mr. Peavey:

I, Lucien P. Tetreault, Jr., represent Tremblay's Bus Co., LLC in my capacity as Vice President. Tremblay's Bus Co., LLC also occupies space at 84 Lawrence Street, Fall River, MA in addition to the New Bedford facility. As previously stated, Tremblay's Bus Co., LLC is a small business concern and we are requesting coverage under the EPA's Small Business Policy.

The Fall River location employs a total of 3 full time employees and 104 part time employees. As with the New Bedford location, these part time employees typically represent school bus drivers and monitors that work approximately 15 to 20 hours per week for 36 weeks of the year. These part time people do not work on holidays, school vacations or in the summer. Our average employee does not work in excess of 720 hours per year.

During a self audit on or about February 28, 2011, we discovered 4 violations that are as follows:

1. Tier 2 Filing – Not previously filed
2. EPCRA 302 – Not previously filed
3. S.P.C.C. – Spill Control Prevention and Counter Measures Plan
4. Storm Water Pollution Prevention Plan & NOI

We are working to correct these violations and we have hired a third party consultant to assist us in preparing the necessary policies and procedures required.

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Tremblay's Bus Co., LLC is requesting coverage under the EPA's Small Business Policy (also known as Policy on Compliance Incentives for Small Businesses) for this Fall River location as well.

If you should have any further questions and or comments with regards to this disclosure, please contact me at (508)999-6436, extension 213.

Yours truly,

A handwritten signature in black ink, appearing to read "Lucien P. Tetreault, Jr.", with a stylized flourish extending from the end of the signature.

Lucien P. Tetreault, Jr., VP



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

FEB 06 2012

Lucien Tetreault, Vice President
Tremblay Bus Co. LLC
284 Myrtle Street
New Bedford, MA 02746

Subject: Small Business Policy Notice of Determination
Self-Disclosure of Violations at Tremblay Bus Co. LLC,
Fall River and New Bedford, Mass.

Dear Mr. Tetreault:

The United States Environmental Protection Agency (EPA) has completed a review of your letter dated March 8, 2011, which disclosed violations of the Emergency Planning and Community Right-to-Know Act (EPCRA) Sections 311/312 with respect to the submission of Tier II Chemical Inventory Forms for reporting years 2007, 2008 and 2009 at your Fall River and New Bedford facilities. The letter also described the circumstances of the discovery of the violations and the actions Tremblay Bus Co. LLC has taken to correct and prevent recurrence of such violations. Please note that this letter only addresses the EPCRA violations that you disclosed on March 8, 2011. EPA has not completed its review of the Clean Water Act violations that you disclosed on March 8, 2011.

On June 3, 1996, EPA issued the "Policy on Compliance Incentives for Small Businesses" (Small Business Policy). The policy was modified on April 11, 2000. The policy states that EPA will waive or reduce civil penalties for violations that are voluntarily discovered, promptly disclosed to EPA, and promptly corrected when certain criteria are met. The Small Business Policy also states that EPA will retain its discretion to recover the economic benefit of noncompliance if such economic benefit is significant in order to maintain an even playing field among the regulated community.

Based solely on the information currently known to EPA, the Agency has determined that the Small Business Policy applies to the situation you have described. Thus, EPA will not initiate an enforcement action to seek gravity-based penalties or recovery of economic benefit because Tremblay Bus Co. LLC discovered, disclosed, and corrected the violations in accordance with the Small Business Policy, and because Tremblay Bus Co. LLC gained no significant economic benefit from the violations. This determination of the applicability of the Small Business Policy is conditioned on the truthfulness and accuracy of your disclosure and is limited to the specific violations which you have disclosed.

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

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Please be aware that the deadline for filing Tier II reports for calendar year 2011 is March 1, 2012.

EPA appreciates the willingness of Tremblay Bus Co. LLC to self-police, voluntarily disclose and correct violations quickly without government intervention. If you have any questions regarding this letter, please contact Jeffrey Norcross at (617) 918-1839.

Sincerely,

Susan Studlien

Susan Studlien, Director
Office of Environmental Stewardship

cc: Jeffrey Norcross, EPA-Region I
Joanne Fillebrown, EPA-Region I
Nicole Starman, EPA-Region I